

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

ALBERTO OVALLE,

Plaintiff,

v.

UNITED RENTALS
(NORTH AMERICA), INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

**CIVIL ACTION
NO. 2:18-cv-00211-D-BR**

JURY TRIAL DEMANDED

**PLAINTIFF, ALBERTO OVALLE’S, FIRST AMENDED DESIGNATIONS OF THE
DEPOSITION OF UNITED RENTALS (NORTH AMERICA), INC. CORPORATE
REPRESENTATIVE, MICHAEL KARABANOFF (TAKEN AUGUST 12, 2019)**

TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to this Court’s order, *see* Rec. Doc. 52, and to Rule 26(a)(3), Plaintiff, Alberto Ovalle, files these Designations of the Deposition of Defendant, United Rentals (North America) Inc.’s, Corporate Representative under Fed. R. Civ. P. 30(b)(6), and will respectfully shows the Court as follows:

No.	Start Page, Line	End Page, Line
1.	Page 6, Line 19	Page 8, Line 22
2.	Page 9, Line 8	Page 9, Line 15
3.	Page 9, Line 17	Page 10, Line 22
4.	Page 11, Line 12	Page 12, Line 18
5.	Page 14, Line 10	Page 14, Line 12
6.	Page 14, Line 16	Page 14, Line 17
7.	Page 16, Line 2	Page 16, Line 3
8.	Page 16, Line 14	Page 16, Line 24
9.	Page 18, Line 20	Page 18, Line 24
10.	Page 19, Line 25	Page 20, Line 12
11.	Page 20, Line 22	Page 21, Line 4
12.	Page 22, Line 23	Page 23, Line 10
13.	Page 23, Line 22 (start at “I think”)	Page 24, Line 25
14.	Page 27, Line 23	Page 28, Line 2
15.	Page 28, Line 8	Page 28, Line 10
16.	Page 29, Line 17	Page 29, Line 21

No.	Start Page, Line	End Page, Line
17.	Page 29, Line 22	Page 30, Line 3
18.	Page 30, Line 4	Page 30, Line 12
19.	Page 31, Line 1	Page 31, Line 13
20.	Page 32, Line 14 (start at "Was the")	Page 34, Line 23
21.	Page 37, Line 3	Page 38, Line 2
22.	Page 46, Line 23	Page 49, Line 11
23.	Page 49, Line 14 (start at "Do you")	Page 49, Line 24
24.	Page 52, Line 18	Page 53, Line 2
25.	Page 61, Line 24	Page 62, Line 5
26.	Page 63, Line 14	Page 63, Line 18
27.	Page 68, Line 11	Page 69, Line 9
28.	Page 80, Line 6	Page 80, Line 15
29.	Page 81, Line 8	Page 82, Line 6
30.	Page 84, Line 18	Page 86, Line 9
31.	Page 86, Line 4	Page 87, Line 11
32.	Page 87, Line 22	Page 90, Line 22
33.	Page 90, Line 24	Page 91, Line 11
34.	Page 92, Line 12	Page 92, Line 22
35.	Page 93, Line 10	Page 93, Line 12
36.	Page 96, Line 17	Page 96, Line 25
37.	Page 97, Line 12	Page 98, Line 5
38.	Page 98, Line 6	Page 98, Line 23
39.	Page 99, Line 5	Page 99, Line 16
40.	Page 101, Line 8	Page 101, Line 14
41.	Page 101, Line 21	Page 102, Line 18
42.	Page 104, Line 18	Page 105, Line 9
43.	Page 107, Line 4	Page 107, Line 13
44.	Page 110, Line 3	Page 111, Line 11
45.	Page 111, Line 24	Page 112, Line 20
46.	Page 112, Line 22	Page 113, Line 14
47.	Page 113, Line 22	Page 113, Line 25
48.	Page 114, Line 9	Page 114, Line 16
49.	Page 114, Line 19	Page 115, Line 6
50.	Page 116, Line 4	Page 117, Line 16
51.	Page 118, Line 18	Page 118, Line 25
52.	Page 119, Line 3	Page 119, Line 8
53.	Page 119, Line 17	Page 120, Line 22
54.	Page 121, Line 9	Page 121, Line 14
55.	Page 122, Line 6	Page 122, Line 13
56.	Page 122, Line 17	Page 122, Line 20
57.	Page 124, Line 7	Page 125, Line 3
58.	Page 125, Line 4	Page 126, Line 2
59.	Page 127, Line 16	Page 128, Line 11
60.	Page 128, Line 16	Page 129, Line 12

No.	Start Page, Line	End Page, Line
61.	Page 129, Line 13	Page 131, Line 3
62.	Page 131, Line 18	Page 132, Line 10
63.	Page 133, Line 1	Page 134, Line 1
64.	Page 134, Line 10	Page 134, Line 14
65.	Page 135, Line 5	Page 135, Line 23
66.	Page 136, Line 13	Page 136, Line 24
67.	Page 137, Line 3	Page 137, Line 13
68.	Page 138, Line 9	Page 138, Line 19
69.	Page 139, Line 20	Page 140, Line 10
70.	Page 140, Line 14 (start at "It says")	Page 140, Line 25
71.	Page 143, Line 3	Page 143, Line 24
72.	Page 144, Line 8	Page 147, Line 12
73.	Page 147, Line 20	Page 149, Line 6
74.	Page 149, Line 12	Page 152, Line 15
75.	Page 155, Line 17	Page 156, Line 13
76.	Page 157, Line 11	Page 157, Line 13
77.	Page 158, Line 2	Page 158, Line 9
78.	Page 159, Line 8	Page 161, Line 13
79.	Page 162, Line 7	Page 163, Line 3
80.	Page 165, Line 9	Page 166, Line 8
81.	Page 167, Line 2	Page 167, Line 6
82.	Page 169, Line 4	Page 170, Line 11
83.	Page 173, Line 4	Page 173, Line 12
84.	Page 173, Line 22	Page 174, Line 13
85.	Page 174, Line 24	Page 175, Line 2
86.	Page 176, Line 1	Page 178, Line 8
87.	Page 181, Line 23	Page 182, Line 6
88.	Page 182, Line 16	Page 183, Line 3
89.	Page 186, Line 6	Page 186, Line 10
90.	Page 188, Line 13 (start at "There were")	Page 189, Line 7
91.	Page 190, Line 4	Page 190, Line 16
92.	Page 191, Line 9	Page 191, Line 15
93.	Page 192, Line 3	Page 193, Line 18
94.	Page 194, Line 14	Page 194, Line 25
95.	Page 195, Line 12	Page 195, Line 16
96.	Page 195, Line 22	Page 196, Line 3

Respectfully submitted,

WILLIAMS HART BOUNDAS EASTERBY, LLP

By: /s/ Cesar Tavares

JIM S. HART
Texas Bar No. 09147400
CESAR TAVARES
Texas Bar No. 24093726
8441 Gulf Freeway, Suite 600
Houston, Texas 77017-5001
(713) 230-2200 – Telephone
(713) 643-6226 – Facsimile
pidept@whlaw.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

On September 30, 2020, Plaintiff's counsel submitted the foregoing document with the clerk of court of the U.S. District Court for Northern District of Texas Amarillo Division, using the electronic case filing system of the court. Plaintiff's counsel certify that they served all counsel parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Cesar Tavares

Cesar Tavares